

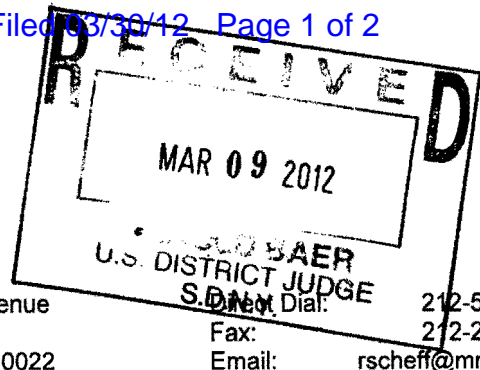


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March 8, 2012

VIA HAND DELIVERY

The Honorable Harold Baer, Jr.
U.S. District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Suite 2230
New York, NY 10007-1312

The Honorable Kimba M. Wood
U.S. District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Suite 1901
New York, NY 10007-1312

Re: U.S. v. Carollo, et al., No. 10 Cr. 654 (HB)
U.S. v. Ghavami, et al., No. 10 Cr. 1217 (KMW)

Dear Judges Baer and Wood:

For the reasons set forth in the attached letter, which Third-Party Movants Investment Management Advisory Group, Inc. ("IMAGE"), David Eckhart, and Martin J. Stallone (collectively, "the IMAGE Movants") request not be entered on the docket, the IMAGE Movants respectfully request leave to file a brief sur-reply to the Government's Application for an Order Resolving Claims of Attorney-Client Privilege or Attorney Work Product as to Consensual Recordings.

Respectfully submitted,

Richard L. Scheff
Richard L. Scheff, Esq.
Montgomery, McCracken, Walker & Rhoads, LLP

Christopher R. Hall
Christopher R. Hall, Esq.
Saul Ewing LLP

*See reply - 4 pages
copy sent to chambers
he allowed.*
SO ORDERED:
Harold Baer Jr.
Harold Baer, Jr., U.S.D.J.
3/30/12
cc: All counsel of record in the above-captioned cases (via email)
Date: _____

USDS SDNY
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MONTGOMERY MCCracken WALKER & RHOADS LLP

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Endorsement:

Sur reply - 4 pages copy sent to Chambers will be allowed.